

Pickens County Branch of the NAACP, et al v. School District of Pickens County.
Civil Action No. 8:23-cv-01736-BHH

Exhibit D

**To School District of Pickens County's Response in Opposition to Plaintiffs' Motion for
Preliminary Injunction**

Declaration of Betty Garrison

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Pickens County Branch of the NAACP;

Rebecca Turner and Brandon Turner, on behalf of
minor children J.T. and G.T.;

Susanna Ashton and Peter Laurence on behalf of
minor children H.L. and C.L.;

Reba Kruse and Derrick Kruse on behalf of minor
children S.K. and R.K.,

Plaintiffs,

v.

School District of Pickens County,

Defendant.

Case No. 8:23-cv-01736-BHH

DECLARATION OF BETTY GARRISON

I, **BETTY GARRISON**, declare pursuant to 28 U.S.C. § 1746 as follows:

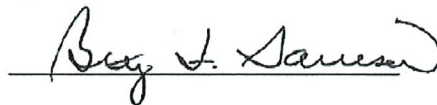
1. My name is Betty Garrison. I am over the age of 18 and am competent to make this declaration. I am a citizen and resident of South Carolina. The facts stated herein are true of my own personal knowledge, and if called to testify, I would so testify.
2. I have a Bachelor's degree in education from Mississippi College; a Master of Education from Clemson University; and a Master of Arts in Secondary School Administration from Furman University. In addition, I attended the South Carolina School Leadership Executive Institute.
3. I held a teaching license from the State of South Carolina for 37 years, and for over 20 of those years I was also certified by the State of South Carolina as a secondary school administrator.
4. In the course of my 37-year career in education, I served as a high school teacher, a guidance counselor, a curriculum assistant, an assistant principal, and as principal of Easley High School in the School District of Pickens County from 2002 to 2009.
5. I have extensive professional training and experience in the operation and administration of public schools, the law of education, and in the selection and development of curriculum, classroom materials, training materials, and school resources.

6. In addition, I have served at various times in numerous other civic and public service capacities, including as a member of the Pickens County Foster Care Review Board, as a Juvenile Arbitrator with the 13th Judicial Circuit, as a member of the Hospital Foundation Board in Easley, as a member and past president of the Rotary Club of Easley, and as a member of the United Way of Pickens County Women's Leadership Council.
7. I currently serve on the Board of Trustees at School District of Pickens County. I have served on the Board since November 2016.
8. In my role as a member of the Board, I voted on September 26, 2022 to remove the book *Stamped: Racism, Antiracism, and You* ("*Stamped*") from the curriculum, library, and media centers of School District of Pickens County high schools.
9. In deciding how to vote in that meeting on the motion to remove *Stamped*, I reviewed and considered the school-level and district-level committees' findings, conclusions, and recommendations regarding the use of *Stamped* in the curriculum, library, and media centers of the School District of Pickens County high schools.
10. In deciding how to vote in that meeting on the motion to remove *Stamped*, I carefully considered the rights, freedom, and responsibilities of students, parents/legal guardians, and teachers in the School District of Pickens County.
11. My recommendation and vote on the motion to remove *Stamped* were based on the school-level and district-level committees' reports, input from stakeholders, and my own independent evaluation of the book, its educational suitability, and the potential for disruption of the educational environment.
12. I do not object to including books, materials, ideas, or discussion in the curriculum and school libraries of the School District of Pickens County regarding race, racism, slavery, the civil rights movement, and historic or contemporary issues and tensions regarding race, racism, and justice, if those books, materials, ideas, or discussions are intellectually appropriate, age appropriate, and educationally suitable for the students of the School District of Pickens County.
13. My decision to vote on September 26, 2022 to remove *Stamped* from the curriculum, library, and media centers of School District of Pickens County high schools was the result of my analysis of the factual errors and omissions in *Stamped* and my conclusion that, as a result of these factual errors and omissions, the book is not intellectually appropriate or educationally suitable for students in the School District of Pickens County.

14. In a board meeting held July 6, 2023, I, along with the other members of the Board of Trustees, voted to allow student access to the book *Stamped* in high school libraries subject to parental consent. This decision mirrors a motion that was made during the Board meeting of September 26, 2022. In the time since that meeting, the Board continued to discuss the issue, has considered the perspectives of new Board members, and has continued to evaluate input from parents and other stakeholders. I continue to have serious concerns regarding the book's factual errors and omissions, its lack of academic rigor, intellectual appropriateness, and educational suitability, and the potential for disruption to the educational environment. Nevertheless, after careful consideration and consultation, and in keeping with the Board's respect for parental authority over the education and upbringing of their children, I voted in the July 6, 2023, meeting to allow *Stamped* to be available in high school libraries with parental consent

15. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 9th day of July, 2023.



Betty Garrison